

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAMONIE EARL, LINDA RUGG, ALESA
BECK, TIMOTHY BLAKEY, JR.,
STEPHANIE BLAKEY, MARISA
THOMPSON, MUHAMMAD MUDDASIR
KHAN, ELIZABETH COOPER, JOHN
ROGERS, VALERIE MORTZ-ROGERS,
and LAKESHA GOGGINS, each individually
and on behalf of all others similarly situated,

Plaintiffs.

v.

THE BOEING COMPANY,
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507-ALM

**NOTICE REGARDING STATEMENTS MADE ON THE
RECORD AT THE MAY 13, 2020 HEARING IN THIS MATTER
AND REQUEST FOR *EX PARTE* IN-CAMERA HEARING**

TO THE CLERK, COURT, AND COUNSEL OF RECORD:

After reviewing the transcript from the May 13th hearing in this matter, I have confirmed what I believe are numerous statements of material fact by David Hecht which are inaccurate, and may have been made to intentionally mislead counsel and the Court. Therefore, I believe I have an ethical duty under Local Rule AT-3(b) and Texas Disciplinary Rules of Professional Conduct 3.03 to correct the record.

Due to the sensitive nature of certain communications that I would need to put before the Court to correct the record, and in light of an email I received from Pierce Bainbridge's outside counsel, Ed Altabet, today, in which he made several baseless accusations against me in what appeared to be an effort to intimidate me and hamper my efforts to correct the record, I request an

In-Camera *ex parte* hearing before the Court. This will enable the Court to review the sensitive communications at issue and make a determination regarding privilege outside the presence of counsel for defendants, before anything is divulged publicly. If the Court would prefer, I will submit a sworn affidavit and the sensitive communications under seal in advance of the In-Camera hearing.¹

Dated: May 18, 2020

Respectfully Submitted

/s/ Andrew M. Williamson

Andrew M. Williamson

(DC Bar No. 1011095)

MEMBER

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¹ Separately, I have sought consent to withdraw as counsel for plaintiffs in this matter because I am no longer affiliated with Pierce Bainbridge and I have not been for about a month. However, I believe that, under the circumstances, it would be best and in the interests of justice for my appearance to remain on the record until the issues raised in this Notice are addressed—unless the Court would prefer otherwise.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service were served with a copy of this document through this Court's CM/ECF system and pursuant to the local rules on May 18, 2020.

/s/ Andrew M. Williamson
Andrew M. Williamson